

# MEMO ENDORSED



HON. SYLVIA O. HINDS-RADIX  
*Corporation Counsel*

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Eric Teszler  
*Assistant Corporation Counsel*  
Office: (212) 356-1652

May 13, 2024

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

The parties' request for this matter to be stayed until August 12, 2024 is granted. The parties are directed to submit a joint status letter by that date. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: 5/14/24  
New York, New York

*Re: A.B. v. N.Y.C. Dep't of Educ., 23-cv-6840 (ER)*

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the Office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiffs seek solely attorneys' fees, costs, and expenses for legal work performed on several administrative proceedings, as well as for this action, pursuant to the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. § 1400, *et seq.*

I write, jointly with Plaintiffs, to respectfully request a 90-day stay of all deadlines in this matter—including the current May 13, 2024 deadline for Defendant to respond to the Complaint (*see* ECF No. 13)—to August 12, 2024. The parties additionally propose filing a joint status letter on or before August 12, 2024. This is the parties' first request for a stay in this matter. The parties make this request to allow for time to explore settlement. This case involves several school years for the plaintiff child, L.B. Plaintiffs will provide a settlement demand with billing records for the within action and underlying actions to Defendant on or before May 20, 2024. Prior to this stay request, the Court granted each of Defendant's requests for extensions of time to respond to the Complaint (*see* ECF Nos. 9, 11, 13). The requested stay is intended to provide Defendant time to conduct the City's internal review of Plaintiffs' attorney billing records together with the underlying administrative record, engage in settlement negotiations with Plaintiffs' counsel, and hopefully resolve this matter without the need for motion practice. This office has settled the majority of similar IDEA fees-only cases brought by plaintiffs represented by the Law Offices of Irina Roller, PLLC in recent years, and the parties are optimistic that this matter will follow the same course. Accordingly, the parties respectfully request that this matter be stayed until August 12, 2024, with a joint status letter due by that same date.

The parties thank the Court for considering these requests.

Respectfully submitted,

/s/ Eric Teszler

Eric Teszler, Esq.

Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)